

medley farm
15.3.

(201) 685-5198

November 28, 1983

James F. Bycott, Esq.
Office of Regional Counsel
Environmental Protection Agency
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Re: Medley Site
Medley, South Carolina

Dear Mr. Bycott:

The information submitted herewith is in response to your October 25, 1983 letter addressed to the Charles S. Tanner Co. ("CST") in Greenville, South Carolina. Our response shall be supplemented as and to the extent that our Freedom of Information request of November 15 aids us in our investigation of this matter. As we indicated earlier National Starch and Chemical Corporation ("National") acquired CST from CIBA-GEIGY Corporation in 1980 and the Medley site operated in the early 1970's, thus making our document search rather difficult.

On the basis of our investigation to date, we have been able to determine that between February, 1974 and June, 1975 CST shipped a number of drums of non-hazardous, aqueous emulsion waste to the Medley farm site. This waste consisted of off-grade and obsolete products which, generically, contained such materials as vinyl acetate and acrylic aqueous copolymers, including formulated compounds thereof, or aqueous polyethylene emulsions and stearate pastes. Such products are currently produced at our CST facility and when off-grade or obsolete and disposed of as waste they are not classified or treated as hazardous under applicable definitions (including CERCLA, RCRA, DOT, and similar South Carolina regulations).

The information regarding these transactions has been provided by Ray Paradowski who was the CST Plant Manager at the time and who is currently employed by NSC at its Salisbury, North Carolina facility.

Obviously, since none of the CST waste was or is hazardous under applicable regulations, National is not a "potentially responsible party" for the clean-up costs expended by EPA under CERCLA. In fact, we were rather distressed to learn that EPA expended CERCLA

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monies on this site without first requesting generators such as CST to aid in identifying and removing their drums of non-hazardous waste, thereby reducing total costs. Our understanding is that this could easily have been accomplished given the condition of the site when EPA commenced this cleanup. We were not even aware that EPA considered this a "Superfund" site, much less that EPA was contemplating an emergency cleanup, until we received your October 25, 1983 letter.

We shall send you photocopies of such documents as we are able to locate to substantiate the above information. While some of this information will consist of "after the fact" documentation regarding CST's current waste, such waste has not materially changed since the early 1970's. If you have any further questions of National concerning this site, please direct your inquiries to the undersigned.

Very truly yours,

NATIONAL STARCH AND CHEMICAL CORPORATION

Alexander M. Samson, Jr.
Associate Counsel.

AMS/pag
Enclosure